

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 0:22-CV-61553-WPD

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE, INC. &  
LIZ VELAZQUEZ McKINNON,

Defendants.

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**STIPULATION FOR SUBSTITUTION OF COUNSEL**

IT IS STIPULATED AND AGREED between the undersigned that RANDY M. GOLDBERG, Esq. and FLORIDA HEALTHCARE LAW FIRM hereby withdraws as counsel of record for Defendants, ALL VIP CARE INC. & LIZ VELAZQUEZ McKINNON, in the above-styled case.

IT IS FURTHER STIPULATED between the undersigned that ELIZABETH P. PEREZ, ESQ., from ELIZABETH P. PEREZ, P.A. be substituted as counsel of record for the Defendants, ALL VIP CARE, INC., P.A., and LIZ VELAZQUEZ McKINNON.

/s/ Elizabeth P. Perez

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this pleading which was filed with the Clerk of the Court was provided to Brian Pollock, Esq., Counsel for Plaintiff, at 135 San Lorenzo Ave., Ste. 770, Coral Gables, FL 33146, brian@fairlawgroup.com via the Court's ECM/ECF Portal on November 20, 2023.

/s/ *Elizabeth P. Perez* \_\_\_\_\_  
ELIZABETH P. PEREZ, ESQ.